

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

Yaakov M. Roth
Acting Assistant Attorney General
Civil Division
Sarah L. Vuong (CA Bar 258528)
Assistant Director
William H. Weiland (MA Bar 661433)
Senior Litigation Counsel
Lauren Bryant (NY Bar 5321880)
Anna Dichter (NJ Bar 304442019)
Jeffrey Hartman (WA Bar 49810)
Catherine Ross (DC Bar 9007404)
Amanda Saylor (FL Bar 1031480)
Eric Snyderman (VA Bar 99563)
Trial Attorneys
U.S. Department of Justice, Civil Division
Office of Immigration Litigation
General Litigation and Appeals Section
P.O. Box 868, Ben Franklin Station
Washington, DC 20044

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**STIPULATION AND [PROPOSED]
ORDER RE: BRIEFING SCHEDULE FOR
PARTIES' CROSS-MOTIONS FOR
SUMMARY JUDGMENT**

Assigned to: Hon. Edward M. Chen

Complaint filed: February 19, 2025

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)
jessica@ndlon.org

3 Lauren Michel Wilfong (*Pro Hac Vice*)
lwilfong@ndlon.org

4 NATIONAL DAY LABORER
ORGANIZING NETWORK
5 1030 S. Arroyo Parkway, Suite 106
Pasadena, CA 91105
6 Telephone: (626) 214-5689

7 Eva L. Bitran (SBN 302081)
ebitran@aclusocal.org

8 Diana Sanchez (SBN 338871)
dianasanchez@aclusocal.org

9 ACLU FOUNDATION
OF SOUTHERN CALIFORNIA
10 1313 West 8th Street
Los Angeles, CA 90017
11 Telephone: (213) 977-5236

12 Erik Crew (*Pro Hac Vice*)
ecrew@haitianbridge.org
13 HAITIAN BRIDGE ALLIANCE
4560 Alvarado Canyon Road, 1H
14 San Diego, CA 92120
15 Telephone: (949) 603-741

Pursuant to Civ. L.R. 6-1(b), 6-2 and 7-12, the Parties, by and through their respective counsel, submit this stipulation and [proposed] order regarding the briefing schedule for the Parties' cross-motions for summary judgment.

WHEREAS, on April 30, 2025, pursuant to the Parties' stipulation, this Court set the following briefing schedule for the Parties' Cross-Motions for Summary Judgment:

- Plaintiffs shall file their Motion for Summary Judgment on or before May 26, 2025.
- Defendants shall file an Opposition to Plaintiffs' Motion for Summary Judgment and their Motion for Summary Judgment on or before June 10, 2025.
- Plaintiffs shall file their Reply in further support of their Motion for Summary Judgment and their Opposition to Defendants' Motion for Summary Judgment on or before June 20, 2025.
- Defendants shall file their Reply to Plaintiffs' Opposition to Defendants' Motion for Summary Judgment on or before June 27, 2025.
- The Court shall hear argument on the Parties' Cross-Motions for Summary Judgment on July 11, 2025. Dkt. 124.

WHEREAS, on May 9, 2025, this Court granted Parties' stipulated request that Plaintiffs file their Motion for Summary Judgment on or before May 27, 2025, in light of the Memorial Day holiday on May 26, 2025. The briefing schedule for the Parties' Cross-Motions for Summary Judgment otherwise remained the same. Dkt. 134.

WHEREAS, on May 19, 2025, pursuant to Court Order, (*see* Dkts. 135, 143), Defendants produced 77 documents responsive to Plaintiffs' first, second and sixth requests for production; and

WHEREAS, on May 22, 2025, Defendants' counsel emailed Plaintiffs' counsel to notify Plaintiffs that 159 documents from USCIS custodians that were potentially responsive to Plaintiffs' requests for production were inadvertently not batched out for review. Defendants' counsel stated that they intended to have the documents reviewed, and responsive, non-privileged documents produced, by May 27, 2025, and offered to adjust the briefing schedule on the Parties' cross-motions for summary judgment to accommodate this belated production.

IT IS THEREFORE STIPULATED AND AGREED, by the Parties and subject to the

approval of the Court:

- Plaintiffs shall file their Motion for Summary Judgment on or before June 3, 2025.
- Defendants shall file their Opposition and Cross-Motion for Summary Judgment on or before June 17, 2025.
- Plaintiffs shall file their Reply in further support of their Motion for Summary Judgment and their Opposition to Defendants' Motion for Summary Judgment on or before June 27, 2025.
- Defendants will waive their Reply in further support of their Motion for Summary Judgment.
- The Court will hear argument on the Parties' Cross-Motions for Summary Judgment on July 11, 2025.

IT IS SO STIPULATED.

Date: May 23, 2025

Respectfully submitted,

ACLU FOUNDATION
OF NORTHERN CALIFORNIA

/s/ Emilou MacLean

Emilou MacLean
Attorneys for Plaintiffs

Date: May 23, 2025

U.S. DEPARTMENT OF JUSTICE

/s/ Anna Dichter

Anna Dichter
Attorneys for Defendants

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have concurred in the filing of this document.

ACLU FOUNDATION
OF NORTHERN CALIFORNIA

/s/ Emilou MacLean

Emilou MacLean

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____, 2025

The Honorable Edward M. Chen
United States District Judge